

TAB 21

Designation Run Report

Lawrence, Stephen Plaintiff and Defense Combined Submission

Lawrence, Stephen 01-04-2019

Plaintiffs Affirmative Designations 00:47:30

Defense Counter Designations 00:04:09

Plaintiff Counter Counters 00:01:19

Defense Completeness Counters 00:03:37

Total Time 00:56:35



Page/Line

Source

ID

198:18 would go straight from the sales to QRA. So I
 198:19 didn't -- wasn't involved in those.
 198:20 Q. Okay. Then you go on to talk
 198:21 about, "The main problem is that 90 stores have
 198:22 been shut off from ordering controlled
 198:23 substances. 60 of those, or two-thirds, are not
 198:24 currently scheduled to have a site visit and
 199:1 have not been told what the status is on these.
 199:2 Many of these were cut off on December 10th.
 199:3 It's now close to a month. This is what I've
 199:4 been telling everyone for quite some time now."
 199:5 Who is "everyone"?

199:7 - 200:9

Lawrence, Stephen 01-04-2019 (00:00:51)

SL02.70

199:7 A. This goes right back to what I
 199:8 said before. The -- I was working with
 199:9 quality -- the QRA group to give us more time
 199:10 and not cut a customer off after the five days.
 199:11 If it took -- the store got a questionnaire back
 199:12 in six days, you know, did it matter? And we
 199:13 were -- we just had a hard five day, we're just
 199:14 going to cut them off. And that didn't make a
 199:15 lot of sense to me.
 199:16 And ultimately fairly -- I think,
 199:17 I don't know what the dates are, but they agreed
 199:18 and they gave a little bit more time.
 199:19 Q. And that's the --
 199:20 A. Which helped a bunch.
 199:21 Q. I'm sorry. That's the e-mail that
 199:22 we saw earlier?
 199:23 A. That's the previous e-mail we just
 199:24 talked about.
 200:1 Q. Okay. And then you go on to say,
 200:2 "I spent three hours with Hartman and the
 200:3 regulatory group on Friday and they are trying.
 200:4 They just don't have the resources, and they are
 200:5 trying to keep too much information from others.
 200:6 I hope this will open up some soon. Steve."
 200:7 The comment on resources, was that
 200:8 your observation, or was that something that the
 200:9 regulatory group told you?

SL02-Lawrence, Stephen Plaintiff and Defense Combined Submission

Page/Line	Source	ID
200:11 - 201:6	Lawrence, Stephen 01-04-2019 (00:00:52) 200:11 A. You know, I don't remember 200:12 exactly. I think the challenge was getting -- 200:13 we were getting a backlog so we couldn't get 200:14 through the Know Your Customer forms quick 200:15 enough. So by just pure definition, you've got 200:16 a resource issue there or something clogging it 200:17 up. I don't specifically remember having that 200:18 conversation with them. 200:19 But at the end of the day, what 200:20 came out of it was that other e-mail where we 200:21 got some extra time so that we just didn't cut 200:22 them off on five days, which was just a hard 200:23 five-day -- there was no -- there wasn't, you 200:24 know, meaning behind it, just five days. 201:1 Q. At this point in time, 201:2 Mr. Lawrence -- so this is December -- I'm 201:3 sorry, January of 2008 -- in comparison to the 201:4 300-or-so employees in sales and the 50-or-so 201:5 employees in marketing, do you know how many 201:6 employees actually worked within QRA?	SL02.71
201:8 - 201:12	Lawrence, Stephen 01-04-2019 (00:00:10) 201:8 A. I do not. 201:9 Q. In comparison to your budget in 201:10 marketing or the budget that eventually you were 201:11 over in sales, do you know what their budget was 201:12 for QRA?	SL02.72
201:14 - 201:14	Lawrence, Stephen 01-04-2019 (00:00:00) 201:14 A. No.	SL02.73